

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CHARLOTTE SAMUELL,

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Plaintiff,

Civil Action No. 7:13-cv-00047

**TOYOTA MOTOR CORP., TOYOTA
MOTOR SALES, U.S.A., INC., and
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH
AMERICA, INC..**

JURY

Defendants.

**PLAINTIFF, CHARLOTTE SAMUELL'S FIRST AMENDED NOTICE OF INTENTION
TO TAKE ORAL VIDEOTAPED DEPOSITION SUBPOENA DUCES TECUM
OF STEPHEN J. FENTON, P.E.**

To: Stephen J. Fenton, P.E., 6070 Greenwood Plaza Blvd., Suite 200, Greenwood Village, Colorado 80111.

Defendants, Toyota Motor Corp., Toyota Motor Sales, U.S.A., Inc., and Toyota Motor Engineering & Manufacturing North America, Inc., by and through their attorneys of record, Brian Mason, Kurt C. Kern, Fred C. Huntsman, Bowman and Brooke LLP, 2501 North Harwood Street, Suite 1700, Dallas, Texas 75201.

PLEASE TAKE NOTICE that Plaintiff in the above-entitled and numbered cause, by and through her attorneys of record, will take the oral and videotaped deposition, by stenographic and audio-visual means, of **Stephen J. Fenton, P.E. on Tuesday, January 6, 2015, beginning at 9:00 a.m.**, and continuing from day to day thereafter until completed. Said deposition will take place at Agren Blando Court Reporting, 216 16th Street, Suite 600, in Denver, Colorado, at which time and place you are notified to appear and take such part in the examination as shall be proper.

SUBPOENA DUCES TECUM

You will also take notice that STEPHEN J. FENTON, P.E. is to produce at the time and place of this deposition, and to permit the inspection and copying of any and all documents which reflect, mention, relate or pertain to the matters that are described herein, including, but not limited to, those items more particularly described in *Exhibit "A"* attached.

Respectfully submitted,

SUMNER, SCHICK & PACE, LLP



Gary L. Fuller
State Bar No. 07518200
3811 Turtle Creek Boulevard, Suite 600
Dallas, TX 75219
Tel: (214) 965-9229
Fax: (214) 965-9215
E-mail: gfuller@sumnerschick.com

Attorney for Plaintiff Charlotte Samuell

EXHIBIT A

UNLESS AGREED OTHERWISE, YOU ARE INSTRUCTED TO BRING THE ORIGINALS OF SUCH DOCUMENTS IF THE ORIGINALS ARE IN YOUR POSSESSION, CUSTODY OR CONTROL, OR THE CONTROL OF YOUR AGENTS OR REPRESENTATIVES; AND YOU ARE FURTHER INSTRUCTED TO PRODUCE COPIES OF THE ORIGINALS ONLY IF SUCH ORIGINALS ARE NOT IN YOUR POSSESSION, CUSTODY OR CONTROL, OR THE COPY INCLUDES MARGINAL NOTES NOT INCLUDED IN THE ORIGINALS.

As used herein, the term "records" includes all documents in the possession, custody or control of the individuals or parties to whom this request is directed, or their agents or representatives, and includes, but is not limited to, papers, memoranda, agreements, contracts, writings, photographs, correspondence, accounts, drawings, graphs, charts, transcriptions of telephone conversations or recordings thereof, certificates, licenses, permits, reports, test data, and/or any other data, compilations from which the requested information can be obtained or translated.

The witness, STEPHEN J. FENTON, is requested to produce the following:

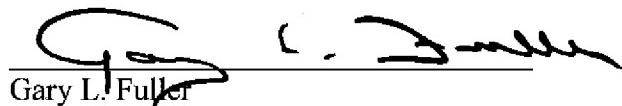
1. A professional resume or curriculum vitae summarizing STEPHEN J. FENTON, P.E.'s professional qualifications and publications, as well as speeches STEPHEN J. FENTON has given.
2. Copies of all scientific and technical publications authored by STEPHEN J. FENTON, P.E. that are relevant to the opinions expressed by STEPHEN J. FENTON and the basis and reasons for them.
3. All time records, diaries, and bills prepared and rendered in connection with the opinions expressed by STEPHEN J. FENTON, P.E. in this case.
4. STEPHEN J. FENTON, P.E.'S complete file in connection with his investigation and evaluation of the issues involved in this case and the opinions expressed by STEPHEN J. FENTON in this case.
5. All documents furnished to STEPHEN J. FENTON, P.E. for review in connection with this case.
6. All documents obtained or created by STEPHEN J. FENTON, P.E., in connection with this case.
7. All documents STEPHEN J. FENTON, P.E. has reviewed, referred to, or relied upon in arriving at any of his opinions or conclusions concerning the issues involved in this lawsuit, including, but not limited to, all scientific and technical articles, publications, codes, standards, and other literature.
8. All models, illustrations, photographs, other exhibits, or documents of any kind which STEPHEN J. FENTON, P.E. intends or contemplates using to explain, illustrate, or support STEPHEN J. FENTON, P.E.'S testimony at the trial of this cause.

- 9. A list of all legal cases in which STEPHEN J. FENTON, P.E., has rendered an opinion, given a deposition or offered testimony at trial for the Plaintiff in the past four (4) years, including the cause number, style of cause, and the attorney's name.**
- 10. All communications between Defendant and STEPHEN J. FENTON that: relate to compensation for his study or testimony; identify facts or data that the Defendants' attorneys provided to him and that he considered in forming the opinions to be expressed; and identify assumptions that Defendants' attorneys provided him and that he relied on in forming his opinions to be expressed.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this instrument has been served by email and U.S. Mail, CMRRR on this 10th day of December, 2014 to the following counsel of record:

Brian Mason
Fred Huntsman
Bowman and Brooke LLP
2501 N. Harwood Street, Suite 1700
Dallas, Texas 75201



Gary L. Fuller

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CHARLOTTE SAMUELL,

Plaintiff,

v.

TOYOTA MOTOR CORP., TOYOTA
MOTOR SALES, U.S.A., INC., and
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH
AMERICA, INC.,

Defendants.

Civil Action No. 7:13-cv-00047

JURY

**PLAINTIFF, CHARLOTTE SAMUELL'S FIRST AMENDED NOTICE OF INTENTION
TO TAKE ORAL VIDEOTAPED DEPOSITION SUBPOENA DUCES TECUM
OF ROBERT D. BANKS, BENG., M.D.**

To: Robert D. Banks, BEng., M.D., 5711 University Heights Blvd., Suite 107, San Antonio, Texas 78249.

Defendants, Toyota Motor Corp., Toyota Motor Sales, U.S.A., Inc., and Toyota Motor Engineering & Manufacturing North America, Inc., by and through their attorneys of record, Brian Mason, Kurt C. Kern, Fred C. Huntsman, Bowman and Brooke LLP, 2501 North Harwood Street, Suite 1700, Dallas, Texas 75201.

PLEASE TAKE NOTICE that Plaintiff in the above-entitled and numbered cause, by and through her attorneys of record, will take the oral and videotaped deposition, by stenographic and audio-visual means, of **Robert D. Banks, BEng., M.D., on Thursday, January 15, 2015, beginning at 9:00 a.m.**, and continuing from day to day thereafter until completed. Said deposition will take place at Koole Court Reporters of Texas, 8000 IH-10 West, Ste. 600 in San Antonio, Texas, at which time and place you are notified to appear and take such part in the examination as shall be proper.

SUBPOENA DUCES TECUM

You will also take notice that ROBERT D. BANKS, BENG., M.D. is to produce at the time and place of this deposition, and to permit the inspection and copying of any and all documents which reflect, mention, relate or pertain to the matters that are described herein, including, but not limited to, those items more particularly described in *Exhibit "A"* attached.

Respectfully submitted,

SUMNER, SCHICK & PACE, LLP


Gary L. Fuller
State Bar No. 07518200
3811 Turtle Creek Boulevard, Suite 600
Dallas, TX 75219
Tel: (214) 965-9229
Fax: (214) 965-9215
E-mail: gfuller@sumnerschick.com

Attorney for Plaintiff Charlotte Samuell

EXHIBIT A

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As used herein, the term "records" includes all documents in the possession, custody or control of the individuals or parties to whom this request is directed, or their agents or representatives, and includes, but is not limited to, papers, memoranda, agreements, contracts, writings, photographs, correspondence, accounts, drawings, graphs, charts, transcriptions of telephone conversations or recordings thereof, certificates, licenses, permits, reports, test data, and/or any other data, compilations from which the requested information can be obtained or translated.

The witness, ROBERT D. BANKS, BENG., M.D., is requested to produce the following:

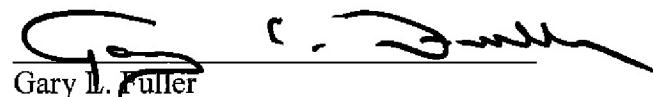
1. A professional resume or curriculum vitae summarizing ROBERT D. BANKS, BENG., M.D.'S professional qualifications and publications, as well as speeches ROBERT D. BANKS, BENG., M.D. has given.
2. Copies of all scientific and technical publications authored by ROBERT D. BANKS, BENG., M.D. that are relevant to the opinions expressed by ROBERT D. BANKS, BENG., M.D. and the basis and reasons for them.
3. All time records, diaries, and bills prepared and rendered in connection with the opinions expressed by ROBERT D. BANKS, BENG., M.D. in this case.
4. ROBERT D. BANKS, BENG., M.D.'S complete file in connection with his investigation and evaluation of the issues involved in this case and the opinions expressed by ROBERT D. BANKS, BENG., M.D. in this case.
5. All documents furnished to ROBERT D. BANKS, BENG., M.D. for review in connection with this case.
6. All documents obtained or created by ROBERT D. BANKS, BENG., M.D., in connection with this case.
7. All documents ROBERT D. BANKS, BENG., M.D. has reviewed, referred to, or relied upon in arriving at any of his opinions or conclusions concerning the issues involved in this lawsuit, including, but not limited to, all scientific and technical articles, publications, codes, standards, and other literature.
8. All models, illustrations, photographs, other exhibits, or documents of any kind which ROBERT D. BANKS, BENG., M.D. intends or contemplates using to explain, illustrate, or support ROBERT D. BANKS, BENG., M.D.'S testimony at the trial of this cause.

9. A list of all legal cases in which ROBERT D. BANKS, BENG., M.D. has rendered an opinion, given a deposition or offered testimony at trial for the Plaintiff in the past four (4) years, including the cause number, style of cause, and the attorney's name.
10. All communications between Defendant and ROBERT D. BANKS, BENG., M.D. that: relate to compensation for his study or testimony; identify facts or data that the Defendants' attorneys provided to him and that he considered in forming the opinions to be expressed; and identify assumptions that Defendants' attorneys provided him and that he relied on in forming his opinions to be expressed.

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Brian Mason
Fred Huntsman
Bowman and Brooke LLP
2501 N. Harwood Street, Suite 1700
Dallas, Texas 75201



Gary L. Fuller

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CHARLOTTE SAMUELL, §
Plaintiff, §
v. § Civil Action No. 7:13-cv-00047
TOYOTA MOTOR CORP., TOYOTA § JURY
MOTOR SALES, U.S.A., INC., and §
TOYOTA MOTOR ENGINEERING & §
MANUFACTURING NORTH §
AMERICA, INC., §
Defendants. §

**PLAINTIFF, CHARLOTTE SAMUELL'S FIRST AMENDED NOTICE OF INTENTION
TO TAKE ORAL VIDEOTAPED DEPOSITION SUBPOENA DUCES TECUM
OF ROBERT C. LANGE**

To: Robert C. Lange, 39100 Country Club Drive, Farmington Hills, Michigan 48331.

Defendants, Toyota Motor Corp., Toyota Motor Sales, U.S.A., Inc., and Toyota Motor Engineering & Manufacturing North America, Inc., by and through their attorneys of record, Brian Mason, Kurt C. Kern, Fred C. Huntsman, Bowman and Brooke LLP, 2501 North Harwood Street, Suite 1700, Dallas, Texas 75201.

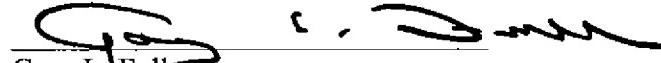
PLEASE TAKE NOTICE that Plaintiff in the above-entitled and numbered cause, by and through her attorneys of record, will take the oral and videotaped deposition, by stenographic and audio-visual means, of **Robert C. Lange on Friday, January 9, 2015, beginning at 9:00 a.m.**, and continuing from day to day thereafter until completed. Said deposition will take place at 39100 County Club Drive in Farmington Hills, Michigan by Stratos Legal, at which time and place you are notified to appear and take such part in the examination as shall be proper.

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You will also take notice that ROBERT C. LANGE is to produce at the time and place of this deposition, and to permit the inspection and copying of any and all documents which reflect, mention, relate or pertain to the matters that are described herein, including, but not limited to, those items more particularly described in *Exhibit "A"* attached.

Respectfully submitted,

SUMNER, SCHICK & PACE, LLP


Gary L. Fuller
State Bar No. 07518200
3811 Turtle Creek Boulevard, Suite 600
Dallas, TX 75219
Tel: (214) 965-9229
Fax: (214) 965-9215
E-mail: gfuller@sumnerschick.com

Attorney for Plaintiff Charlotte Samuell

EXHIBIT A

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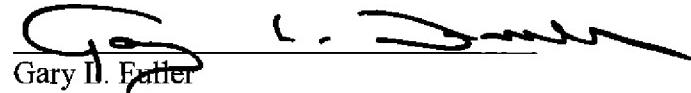
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3. All time records, diaries, and bills prepared and rendered in connection with the opinions expressed by ROBERT C. LANGE in this case.
4. ROBERT C. LANGE'S complete file in connection with his investigation and evaluation of the issues involved in this case and the opinions expressed by ROBERT C. LANGE in this case.
5. All documents furnished to ROBERT C. LANGE for review in connection with this case.
6. All documents obtained or created by ROBERT C. LANGE, in connection with this case.
7. All documents ROBERT C. LANGE has reviewed, referred to, or relied upon in arriving at any of his opinions or conclusions concerning the issues involved in this lawsuit, including, but not limited to, all scientific and technical articles, publications, codes, standards, and other literature.
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Brian Mason
Fred Huntsman
Bowman and Brooke LLP
2501 N. Harwood Street, Suite 1700
Dallas, Texas 75201



Gary L. Fuller